

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

M.H. and J.H., on behalf of their minor child
C.H.,

Plaintiffs,

Civil Action No. 2:20-cv-11294-KM-JBC

v.

OMEGLE.COM, LLC.,

Defendant.

**STIPULATION FOR TRANSFER OF VENUE TO THE UNITED STATES
DISTRICT COURT FOR THE MIDDLE DISTRICT OF FLORIDA**

Plaintiffs M.H. and J.H., by and through their counsel Hach Rose Schirripa and Cheverie LLP, by Hillary Nappi, Esq., on one hand, and Defendant Omegle.com, LLC by and through its counsel Trimboli & Prusinowski, LLC, by James T. Prusinowski, Esq. on the other hand, hereby stipulate to the transfer of venue from the United States District Court for the District of New Jersey to the United States District Court for the Middle District of Florida.

This case was initiated in the District of New Jersey. On November 20, 2020 Defendant filed a motion to dismiss on the grounds that (1) the Court lacked personal jurisdiction over Defendant and (2) the Complaint failed to state a claim for relief. On March 19, 2021, the Court granted Defendant's motion on the basis that it lacked personal jurisdiction over Defendant and therefore denied as moot the Rule 12(b)(6) motion based on the Court's lack of power to consider it. The Court stayed its dismissal order for 14 days and instructed the parties to submit their positions on transferring the case in a letter. Rather than

expend the parties' efforts and consume the Court's resources, the parties agree that jurisdiction and venue are proper in the United States District Court for the Middle District of Florida and seek an order transferring this case to that court. The parties further stipulate that, unless otherwise ordered by the transferee court, Defendant will plead or otherwise respond to Plaintiffs' Complaint within thirty (30) days after the transfer is completed or thirty (30) days after Plaintiffs file an Amended Complaint in the transferee court.

WHEREFORE, the Parties stipulate to change of venue and hereby request that the Court approve of the request and issue an order changing venue to the United States District Court for the Middle District of Florida.

DATED: New York, New York
 April 1, 2021

**HACH ROSE SCHIRRIPA &
CHEVERIE, LLP**

/s/ Hillary Nappi

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Dated: Morristown, New Jersey
April 1, 2021

Trimboli & Prusinowski, LLC

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Attorneys for Defendant Omegle.com LLC

SO ORDERED

s/Kevin McNulty
Hon. Kevin McNulty
U.S. District Judge
Date: 4/5/2021